

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RYAN S. WATSON, individually and as
Trustee of the Watson Family Gun Trust,

Plaintiff,

v.

ERIC H. HOLDER, JR., , Attorney General of
the United States, and B. TODD JONES,
Director, Bureau of Alcohol, Tobacco, Firearms
& Explosives,

Defendants.

Civil Action No. 2:14-cv-6569-SD

**DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, FOR
SUMMARY JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6), and 56(a), Defendants hereby move this Court to dismiss Plaintiff's Complaint, or in the alternative, for summary judgment. In accordance with Local Rule 7.1, this motion is accompanied by a brief that sets forth the contentions of law, arguments and authorities on which Defendants rely in support of this motion. A form of order also accompanies this motion.

Dated: January 16, 2015

Respectfully submitted,

JOYCE R. BRANDA
Acting Assistant Attorney General

ZANE D. MEMEGER
United States Attorney

/s/ Eric J. Soskin
DIANE KELLEHER
Assistant Branch Director

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CERTIFICATE OF SERVICE

On January 16, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Pennsylvania, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2) or the local rules.

/s/ Eric J. Soskin
Eric J. Soskin